

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUDY WANG, derivatively on behalf of
TRAVELZOO, INC.,

Plaintiff,

v.

RALPH BARTEL, HOLGER BARTEL,
WAYNE LEE, DAVID J. EHRLICH,
DONOVAN NEALE-MAY, KELLY M.
URSO, and CHRISTOPHER LOUGHLIN,

Defendants,

and

TRAVELZOO, INC.,

Nominal Defendant.

Civil Action No. 1:11-CV-06125-GBD

ANTHONY A. WIRTH, derivatively on
behalf of TRAVELZOO, INC.,

Plaintiff,

v.

RALPH BARTEL, CHRISTOPHER
LOUGHLIN, KELLY M. URSO,
HOLGER BARTEL, DAVID J.
EHRLICH, DONOVAN NEALE-MAY,
and, WAYNE LEE,

Defendants,

and

TRAVELZOO, INC.,

Nominal Defendant.

Civil Action No. 1:11-CV-06378-BSJ-RLE

(continued)

**DECLARATION OF ROBERT B. WEISER IN SUPPORT OF PLAINTIFFS JUDY
WANG’S AND KEVIN KITT’S MOTION TO CONSOLIDATE RELATED ACTIONS
AND APPOINT LEAD COUNSEL AND LIAISON COUNSEL**

KEVIN KITT, derivatively on behalf of
TRAVELZOO, INC.,

Plaintiff,

v.

RALPH BARTEL, HOLGER BARTEL,
WAYNE LEE, DAVID J. EHRLICH,
DONOVAN NEALE-MAY, KELLY M.
URSO, and CHRISTOPHER LOUGHLIN,

Defendants,

and

TRAVELZOO, INC.,

Nominal Defendant.

Civil Action No. 1:11-cv-7019 (GBD)

Robert B. Weiser, being first duly sworn, deposes and states as follows:

1. I am an attorney duly licensed to practice before all of the courts of the Commonwealth of Pennsylvania and the State of New Jersey. I am a founding member of The Weiser Law Firm, P.C. (the “Weiser Firm”), and counsel for plaintiff Judy Wang.

2. I submit this declaration in support of plaintiffs Judy Wang’s And Kevin Kitt’s motion to consolidate related actions and appoint my firm as Lead Counsel, and appoint Harwood Feffer LLP as Liaison Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

3. The Weiser Firm is a national shareholder litigation firm devoted to protecting the interests of individual and institutional investors in shareholder class, derivative, and ERISA actions in state and federal courts nationwide. The Weiser Firm has an excellent reputation in the field of shareholder litigation, and its principals have been involved in some of the most

successful shareholder derivative actions in history. The attorneys at the Weiser Firm devote a large percentage of their time to addressing corporate governance issues. Attached hereto as Exhibit 1 is a true and correct copy of the firm resume of the Weiser Firm. Attached hereto as Exhibit 2 is a true and correct copy of the firm resume of Harwood Feffer LLP.

4. The Weiser Firm has conducted a significant amount of work in investigating the potential claims asserted in the above-captioned actions and has and will continue to commit extensive resources necessary to zealously prosecute the actions and represent the interests of Travelzoo, Inc., the nominal defendant.

5. After the first two above-captioned complaints were filed, I communicated with counsel for the plaintiff Anthony A. Wirth to discuss the orderly consolidation of the respective actions and the leadership structure. However, unfortunately, no agreement was reached and I believe the proposed structure which is supported by plaintiffs in two of the three cases is appropriate here and in the best interests of the Company and its shareholders.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 10th day of October, 2011, at Wayne, Pennsylvania.

A handwritten signature in cursive script that reads "Robert B. Weiser". The signature is written in dark ink and is positioned above a horizontal line.

Robert B. Weiser